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Attorneys for Defendant
LVNV FUNDING, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

TINA MARTINEZ,

Plaintiff,

vs.

LVNV FUNDING, LLC, and
FINANCIAL RECOVERY SERVICES,
INC.,

Defendants.

Case No.: 1:24-cv-01597-JLT-CDB

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 28 DAYS (L.R. 144)**

Action Filed: December 30, 2024

Judge: Hon. Jennifer L. Thurston

Trial Date: Not Yet Set

1 Plaintiff TINA MARTINEZ (“Plaintiff”) and Defendant LVNV FUNDING,
2 LLC (“Defendant”), through their counsel of record, hereby stipulate and agree to
3 extend Defendant’s time to answer or otherwise plead in response to Plaintiff’s
4 Complaint as follows:

- 5 1. Plaintiff filed the Complaint against Defendant on December 30, 2024;
- 6 2. Plaintiff served the Complaint on Defendant on January 2, 2025;
- 7 3. Defendant’s initial deadline to answer or otherwise plead in response to
8 Plaintiff’s Complaint is January 23, 2025;
- 9 4. The Parties stipulate to extend the time for Defendant to file a response to
10 the Complaint by twenty-one (21) days through and including February 13, 2025;
- 11 5. Per Local Rule 144 (Fed. R. Civ. P. 6), this stipulation does not require a
12 proposed order because the extension of time to respond to the Complaint is not
13 greater than twenty-eight (28) days from the initial response deadline.

14 WHEREFORE, the Parties agree that Defendant’s time within which to answer
15 or otherwise plead in response to Plaintiff’s Complaint shall be extend through and
16 including February 13, 2025.

17 **IT IS SO STIPULATED.**

18 DATED: January 22, 2025

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20
21 By: /s/ B. Ben Mohandesi
22 B. Ben Mohandesi
23 Kristel A. Robinson
Attorneys for Defendants

24 DATED: January 22, 2025

25
26 By: /s/ Ely Grinvald (as authorized on 01/21/2025)
27 Ely Grinvald
28 Attorney for Plaintiff
Tina Martinez

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By /s/ B. Ben Mohandesi
B. Ben Mohandesi